

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

RAYMOND HAWKINS, ROBIN LUNG,)
NEEDY KRISINA BAJAO-WIRTJES,)
RACHEAL LOVELL NEELY, SOMMER)
MOORE, ADAM DIPZINSKI, JONATHAN) **CIVIL ACTION NO.: 1:19-cv-01062-JPH**
WILSON, ISMAEL ATAYDE-)
GONZALES, CARLOS CANO, CAROLA)
SPURLOCK, LEIGHA AYRES, and)
ALVARO CRUZADO, individually and on)
behalf of all others similarly situated,)
)
Plaintiffs,)
v.)
)
CINTAS CORPORATION, BOARD OF)
DIRECTORS OF CINTAS)
CORPORATION, SCOTT D. FARMER,)
INVESTMENT POLICY COMMITTEE,)
and JOHN DOES 1-30.)
Defendants.)

**PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT, CERTIFICATION OF
SETTLEMENT CLASS, AND APPROVAL OF PLAN OF ALLOCATION**

Plaintiffs, Raymond Hawkins, Robin Lung, Needy Krisina Bajao-Wirtjes, Racheal Lovell Neely, Sommer Moore, Adam Dipzinski, Jonathan Wilson, Ismael Atayde-Gonzales, Carlos Cano, Carola Spurlock, Leigha Ayres and Alvaro Cruzado (collectively “Plaintiffs”), participants in the Cintas Partners’ Plan (the “Plan”), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting final approval to the class action settlement in this action on the terms of the Class Action Settlement Agreement (“Settlement Agreement”), fully executed on February 9, 2024, and previously filed with the Court on February 9, 2024 (ECF No. 70-2).
2. Certifying the Class as defined in the April 9, 2024 Preliminary Approval Order

(ECF No. 74) and Amended Preliminary Approval Order (ECF No. 76);

3. Appointing Plaintiffs as Class Representatives and Plaintiffs' Counsel as Class Counsel under FED. R. CIV. 23(g);

4. Finding that the manner in which the Settlement Class was notified of the Settlement was the best practicable under the circumstances and adequately informed the Settlement Class members of the terms of the Settlement, how to lodge an objection and obtain additional information; and

5. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

A. Memorandum of Law in support of Plaintiffs' Motion for Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of Plan of Allocation; and

B. Declarations of Plaintiffs' Counsel, Plaintiffs, and Settlement/Notice Administrator.

Attached hereto is the proposed Final Approval Order and Judgment in the form agreed to by the Parties.

Dated: June 3, 2024

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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*Attorneys for Plaintiffs, the Plan
and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2024, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.